Case 15-18352-JNP Doc 25 Filed 07/06/15 Entered 07/06/15 16:39:02 Desc Main Document Page 1 of 1

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June 30, 2015

Bankruptcy Court Clerk P.O. Box 2067 Camden, NJ 08101-2067

Reference:

John J. Hutt

Case No. 15-18352

Dear Sirs:

On behalf of creditors Michael and Mary Ann Baduini, please enter their objection to the debtor's motion to vacate the order of dismissal and reinstate this case. It is now clear that Mr. Hutt filed this bankruptcy case solely with the intention of delaying his eviction from the residential premises originally listed as his address in the original filing. Mr. Hutt did not file the bankruptcy until after the judgment for possession had already been entered in the Landlord/Tenant Court in Atlantic County, New Jersey. Mr. Hutt is or should have been aware that filing the bankruptcy after the judgment for possession would not affect the eviction. The filing did have the desired effect however, since the landlord was required to make a motion to allow the eviction to proceed; this delayed the proceedings by three to four weeks. Once it became clear that the eviction was going to be allowed to proceed, Mr. Hutt apparently chose to allow the improper bankruptcy filing to be dismissed.

Based upon the above and the filing for an improper purpose in the initial filing, it is respectfully requested that Mr. Hutt not be permitted to reinstate the initial case, but be required to file the matter all over again.

Respectfully submitted,

William A. Thompson, III, Esq.

Attorney for Michael & Mary Ann Baduini

MR

FILED

JAMES J. WALDRON, CLERK

JUL - 6 2015

U.S. BANKRUPTOY COURT CAMDEN, N.J.

WAT/sgt

CC: John J. Hutt M/M Baduini